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Lowell, AR 72745

September 20, 1999

9310 '99 OCT 13 A9:52

Dockets Management Branch (HFA-305)  
FDA  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

To Whom It May Concern:

This letter is in reference to Docket No. 99N-1307.

The FDA proposal to require "Safe Handling Instructions" to be printed on labels of shell eggs is very disturbing and needs further consideration before final action is taken. The financial impact this proposal will have on the Egg Industry and educating the public about food safety concerns should be thoroughly considered.

By your own account, according to the Foodborne Diseases Active Surveillance Network (Food Net), from 1996 - 1998, there has been a 44 percent decrease in the number of illnesses caused by S enteritidis. Much of the credit is due to hens being vaccinated with a killed SE bacterin. Your writings show that an eggs contents can be contaminated with SE before the egg is laid. You may not be aware; this source of contamination can be reduced and many times eliminated by vaccination of started pullets (before hens start laying eggs) with a commercial bacterin at the farm.

More information about the success of using killed bacterins to reduce and eliminate SE contamination of the egg before it is laid can be obtained by writing to:  
Biomune Company, 8906 Rosehill Road, Lenexa, KS 66215.

After reviewing the facts and success of vaccinating millions of hens worldwide against SE contamination, I think you will agree a fresh new approach to consumer food safety warrants consideration. The industry already has the tools to advance and promote food safety off eggs at the farm level.

Thus, it is recommended that Egg Producers that implement and maintain a vaccination program for the control and elimination of SE should be recognized and exempt from the proposed legislation.

Your consideration of this information is appreciated.

Respectfully,



James G. Basler

CC: The Honorable Dan Glickman, U.S. Secretary of Agriculture

99N-1307

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**2 LB. POSTAGE RATE REGARDLESS OF WEIGHT  
DOMESTIC USE ONLY**

**FOR PICKUP CALL 1-800-222-1811**



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PAID  
LOWELL, AR  
72745  
OCT 06, 99  
AMOUNT  
**\$3.20**  
90063454-06



**PRIORITY  
MAIL**

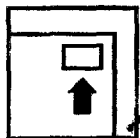
UNITED STATES POSTAL SERVICE

**HOW TO USE:**



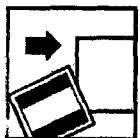
**1. COMPLETE ADDRESS LABEL AREA**

Type or print required return  
address and addressee information  
in customer block (white area)  
or on label (if provided).



**2. PAYMENT METHOD**

Affix postage or meter strip to area  
indicated in upper right hand corner.



**3. ATTACH LABEL (if provided)**

Remove label backing and adhere  
over customer address block area  
(white area).

**J. G. BASLER  
315 LINKS DR. #106  
LOWELL, AR 72745**

**TO:**

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